



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEE

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

DP BAR CODE NO.: 404442 EPA FILE SYMBOL NO.: 19713-AUE DECISION NO.: 467137
PC Code(s): 217500,103601 ACTION CODE: R301
FOOD Use: No

DATE OUT: September 24, 2012

SUBJECT: End Use Product Chemistry Review
Product Name: Drexel Imitator PA Plus Weed & Grass Killer

FROM: Hari Mukhoty
Product Chemistry Team
Technical Review Branch / Registration Division (7505P)

TO: Hope Johnson, CRM / Kable Davis PM - 25
Herbicide Branch / Registration Division (7505P)

Handwritten: Jmu. 8/25/12

Company Name: Drexel Chemical Company
Formulation Type: Not provided by Registrant

INTRODUCTION:

The registrant has submitted one basic CSF (Dated: 06/07/2012) and proposed a product specific label for the registration of the aforesaid product under EPE File Symbol No. 19713-AUE. The registrant submitted product chemistry data under MRID(s): 488845-01, -02 and -03 to support the registration of the proposed product.

TRB has been requested to evaluate the product chemistry data required for registration of the proposed product.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Glyphosate IPA Salt (2.0%) and Pelargonic acid and related fatty acids (2.0%).
2. Has the registrant claimed substantial similarity to registered product?
[X] Yes [] No [] NA If yes: EPA Reg. No. 71995-33
3. The source material(s) of the active ingredient(s) is/are registered with the Agency. The source of Glyphosate IPA salt is a registered product. The source of Pelargonic acid is not a registered product. The results of five batch analysis can be found in MRID: 488845-01, Pages 23 & 41.
4. All inert ingredients have been screened by IIAB on 04/27/2012 and have been approved for non-food uses only.
5. The CSF of the proposed basic formulation has been filled out completely and correctly.

DP BAR CODE NO.: 404588 EPA FILE SYMBOL NO.: 2596-RTU DECISION NO.: 463791
PC Code(s): 105402,128965 ACTION CODE: R301
FOOD Use: No

6. Confidential Statement of Formula(s):

☒ Basic - Dated: 06/07/2012 re-submitted - Dated: NA
☐ Alternate Dated: NA re-submitted: Dated: NA

Alternate CSF(s) complies with 40CFR §152.43: ☐ Yes ☐ No NA ☒. Alternate CSF is not acceptable for other changes needed to become acceptable.

7. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concur with product label (PR Notice 91-2)
☒ Yes

Is the sub statement in compliance with PR Notice 97-6?

☒ Yes ☐ No - Uses the term "Other Ingredients"
, if not, explain below:

Metallic equivalent: ☐ Yes ☒ NA;
Soluble arsenic: ☐ Yes ☒ NA
Isomeric ratios: ☐ Yes ☒ NA
Acid equivalent: ☐ Yes ☒ NA

b. Health related sub statements:

Petroleum distillate at > 10%: ☐ Yes ☐ No ☒ NA
Methanol at > 4%: ☐ Yes ☐ No ☒ NA
Sodium Nitrate / Sodium Nitrite ☐ Yes ☐ No ☒ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☐ Yes ☒ No

Total Release Fogger PR Notice 98-6 (40 CFR 156.78 d): ☐ Yes ☐ No ☒ NA

d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No

Final decision of overall label acceptance will be made by the PM.

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8. Group A: Product Chemistry Data

TRB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos. 488845-01, -02
			Yes	No		
830.1550	Product Identity & Composition		X		A	"
830.1600	Description of materials used to produce the product		X		A	"
830.1650	Description of formulation process		X		A	"
830.1670	Discussion on the formation of impurities		X		A	"
830.1700	Preliminary analysis		X		A	"
830.1750	Certified limits (158.350)	Standard certified Limits	X		A	
		Justification for wider limits				
830.1800	Enforcement analytical method #		X		"	"

A = Acceptance, NR = Not Required, G = Data Gap,
 W = Waiver Request, I = In Progress, NA = Not Acceptable

Analytical Method: HPLC was used to quantify Glyphosate IPA salt. Pelargonic acid was quantified by GC using FID detector.

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9. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.* 488845-03
830.6303	Physical State	Liquid	A	"
830.6315	Flammability	Not flammable stated in the CSF	A	"
830.6316	Explodability	NA	A	"
830.7000	pH	8.19	A	"
830.7300	Density	8.36 lbs/gal	A	"

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request,
NA = Not applicable, I = In progress.

CONCLUSIONS:

1. TRB has reviewed the CSF (dated: 06/07/2012) for the proposed basic formulation and has found it to be acceptable. The CSF is attached with this review and can be located in OPPIN CHEM DOCS.
2. The proposed product is substantially similar to the cited product.
3. Product chemistry Group A data and Group B data, with the exception of Storage stability (830.6317) and Corrosion characteristics (830.6320) are satisfied and acceptable.
4. The registrant must generate one year storage stability (830.6317) and corrosion characteristics (830.6320) data on the proposed product. It is required that the observations be made at 0, 3, 6, 9, and 12 month intervals. The results must be submitted to the Agency in electronic and hard copy format.
5. The proposed label was screened as it pertains to the product chemistry requirements. The PM should get the "Formulation Type" from the registrant. The proposed label claims that the proposed product is approved for use in vegetable gardens. The PM should clarify this statement because IIAB approved the inerts for non-food uses only. The final review of the proposed label and uses are the purview of the PM team.

